

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

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IN THE MATTER OF:

GREAT PLATTE RIVER ROAD  
MEMORIAL FOUNDATION,

CASE NO. 13-40411  
CHAPTER 11

Debtor.

**DEBTOR'S MOTION FOR SHORTENED  
NOTICE PERIOD AND EXPEDITED  
HEARING**

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COMES NOW Great Platte River Road Memorial Foundation, ("Debtor") the Debtor and Debtor-in-Possession herein, and requests a shortened notice period and an expedited hearing on its Motion Requesting Authority to Incur Unsecured Debt (the "Motion") In support of its motion, Debtor states and alleges as follows:

1. Debtor's statements and allegations included in the Motion are incorporated herein by reference. The requested relief should not be controversial, since the Debtor does not request permission to grant liens or security interests in order to collateralize the debt.

2. A shortened notice period and expedited hearing is necessary in order to permit Debtor to enter into the Agreement in a timely manner in order to meet its day-to-day business obligations.

3. Court approval by no later than Friday, March 8, or as soon thereafter as possible, is necessary in order for Debtor to pay its employees and pay other expenses necessary for day-to-day operation.

4. If Court does not allow a shortened notice period and an expedited hearing, Debtor will shortly be forced to cease its operations.

WHEREFORE, the Debtor hereby requests that the Court shorten the notice period and forthwith bring the Motion on for hearing.

Dated this 6<sup>th</sup> day of March, 2013.

GREAT PLATTE RIVER ROAD MEMORIAL  
FOUNDATION, Debtor,

By: s/ T. Randall Wright

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